

Exhibit A

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N. Ari Weisbrot, Esq. (NW-6029)
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re Navidea Biopharmaceuticals Litigation

Case No.: 1:19-cv-01578-VEC

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Dr. Michael M. Goldberg, M.D., by his attorneys, will take the deposition on oral examination of Navidea Biopharmaceuticals, Inc., 4995 Bradenton Avenue, Suite 240, Dublin, OH 43017, before a notary public or other person authorized by law, at the Law Office of N. Ari Weisbrot LLC, 370 Lexington Avenue, Suite 2102, New York, NY 10017 on January 23, 2020 at 9:00 A.M. on the issues set forth in the First Amended Complaint and the Answer, Counterclaims and Third-Party Complaint, copies of which are annexed hereto as Exhibits A and Band the topics set forth on Exhibit C.

The deposition will be recorded stenographically. You are invited to attend and cross

examine.

Dated: Westchester, New York
January 9, 2020

/s/ Gregory Zimmer
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By: /s/ N. Ari Weisbrot, Esq.
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EXHIBIT A

EXHIBIT B

EXHIBIT C

1. Navidea's access to Dr. Goldberg's Macrophage e-mails.
2. Navidea's access to and use of testing results, data and intellectual property performed, created and/or developed by Macrophage.
3. Efforts to maintain the confidentiality of any testing results, data and intellectual property obtained from Macrophage.
4. Any invention disclosure forms created since August 14, 2018 concerning therapeutics.
5. Any patents filed by Navidea since August 14, 2018 concerning therapeutics.
6. All data provided to any intellectual property attorneys concerning therapeutics between August 14, 2018 and the present.
7. Any joint ventures, cooperation agreements or other collaborations with third parties involving testing results, data or intellectual property obtained from Macrophage.